

KPU Telecommunications

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February 2, 2006

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Certification of CPNI Filing (February 2, 2006)
Docket No. EB-06-TC-060; EB-06-36
FRN: 0004325148

Dear Ms. Dortch:

In compliance with the FCC's Public Notice, DA 06-223 (released on January 30, 2006), City of Ketchikan d.b.a. KPU Telecommunications hereby files its report providing its annual CPNI officer certification and accompanying statement explaining how its operating procedures ensure compliance with the FCC's CPNI rules.

Should you have any questions or need additional information, please contact the undersigned.

Sincerely,

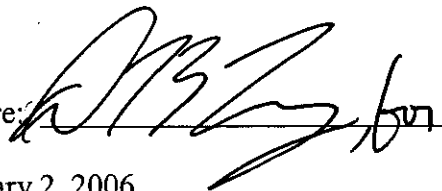
Van. G. Abbott
Manager, KPU Telecommunications

cc: Mr. Byron McCoy (FCC)
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ANNUAL CERTIFICATE OF COMPLIANCE
WITH CPNI REGULATIONS

I, Van G. Abbott, an officer of City of Ketchikan d.b.a. KPU Telecommunications (hereinafter "the Company"), do hereby certify based upon my personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the rules in 47 C.F.R. §§ 64.2001-64.2009. The statement accompanying this certificate explains how the Company's operating procedures ensure that it is in compliance with those rules.

Officer's signature: 

Date: February 2, 2006

OPERATING PROCEDURES FOR COMPLIANCE
WITH CPNI REGULATIONS

Every employee of City of Ketchikan d.b.a. KPU Telecommunications (the "Company") has a duty to protect the confidentiality of customer proprietary information ("CPNI"), as defined in 47 U.S.C. § 222(f). A violation of the Company's operating procedures will result in disciplinary action. For a first violation, an employee will be given a warning and the violation will be noted on the employee's record. An employee will be subject to termination of employment for a second violation.

The service categories provided by the company include local exchange telephone service, long distance telephone service, IPTV and Internet access service. It is the Company's policy to not use CPNI for cross sales or marketing purpose. Specifically, use of CPNI obtained from the Company's provision of one service category to market a second service category to individuals or businesses that are not already customers of that second service category is strictly prohibited.

No Company employee shall disclose CPNI to any Company affiliate or other third party unless such disclosure is required by a lawful subpoena or is used for the following purposes: (1) to bill or collect payment for the Company's services or (2) to protect the rights or property of the Company or its customers. A Company employee that receives or obtains CPNI for the purpose of providing any telecommunications service shall use such information only for such purpose, and shall not use such information for any marketing purpose.

A Company employee shall disclose CPNI only upon an affirmative request by the customer and only after validating that the person requesting the information is the person that opened the account with the Company. The validation process must, at a minimum, include asking the person requesting CPNI for the last four digits of the customer's social security

number and only disclosing the CPNI if the correct four digits are provided. No Company employee shall disclose CPNI to a person other than the customer unless the customer provides written authorization affirmatively requesting that the customer's CPNI be disclosed to that person.

The Company keeps a record of all instances where CPNI is disclosed or provided to third parties, or where third parties are allowed access to CPNI (hereinafter referred to as "the CPNI record"). An employee that discloses CPNI to a third party or allows a third party access to CPNI must add to the CPNI record the name and address of the third party, a description of the reasons for the disclosure of the CPNI, the specific CPNI that was disclosed, and any written authorization from the customer to disclose the CPNI. This record is maintained by the Company for a minimum period of one year.

The Company will regularly hold training sessions to train employees as to when they are and are not authorized to use or disclose CPNI. Employee attendance at these training sessions will be mandatory.

Should the Company make a decision to modify its prohibition on the use of CPNI for marketing purposes, it will notify all employees of any such modifications. Under no circumstances will CPNI be used for any marketing purpose until after the Company has sent customers the notices required by 47 C.F.R. § 64.2008 and received the customer opt-in or opt-out approvals required for such use of CPNI. Sales personnel must obtain written supervisory approval before soliciting customer approval for any out-bound marketing campaign. The Company will establish a system by which the status of a customer's CPNI approval can be clearly established if the Company changes its current policy and decides to use CPNI in an out-bound sales or marketing campaign. Upon such a change in Company policy, employees must add to the CPNI record a description of each such out-bound marketing campaign, the specific

CPNI that was used in the campaign, and what products and services were offered as part of the campaign.